

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION COMMISSION**

**APPLICATION OF NGL WATER SOLUTIONS  
PERMAN, LLC FOR APPROVAL OF SALT  
WATER DISPOSAL WELL IN  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 20475**

**PRE-HEARING STATEMENT OF COG OPERATING LLC**

COG Operating LLC, the opponent in the above referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES OF THE PARTIES:**

**APPLICANT:**

NGL

**ATTORNEYS:**

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**OPPOSING:**

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### **OPPOSITION'S STATEMENT OF THE CASE**

In Case No. 20475 NGL Water Solutions Permian, LLC, seeks an order approving disposal into the Silurian and Devonian formations through the Whitt 32 SWD #1 well at a surface location 219 feet from the South line and 2,395 feet from the West line of Section 32, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico for the purpose of operating a salt water disposal well. NGL's proposed well is only about ¼ mile from Concho's planned Littlefield 33 Fed SWD No. 1 which has been proposed to be located 1000 feet from the South line and 370 feet from the West line, Section 33, Township 26 South, Range 29 East, Eddy County, New Mexico. This location is on Concho's leasehold. The disposal water will be injected into the Devonian/Silurian. NGL has also proposed the Whitt 31 SWD well in Case No. 20404 which is approximately a mile from its Whitt 32 SWD well. Concho contends that NGL's proposed wells are sited too close to each other for injection into the Devonian. Additionally, the Whitt 32 is too close and will interfere with Concho's planned, on-lease disposal.

### **PROPOSED EVIDENCE**

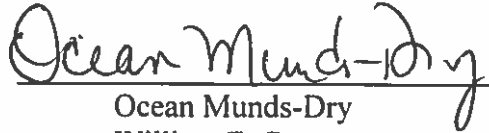
<b><u>WITNESS</u></b>	<b><u>ESTIMATED TIME</u></b>	<b><u>EXHIBITS</u></b>
Mike Wallace, Landman	15 minutes	4
Brad Holland, Geologist	30 minutes	5

### **PROCEDURAL MATTERS**

Concho requests a continuance of this matter to the next available docket. Both witnesses are unavailable for the May 30<sup>th</sup> docket. We have contacted NGL's counsel of record regarding the continuance and have not had a response yet.

Respectfully submitted,

COG OPERATING LLC



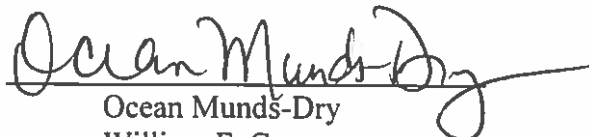
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ATTORNEYS FOR COG OPERATING LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on May 23, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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